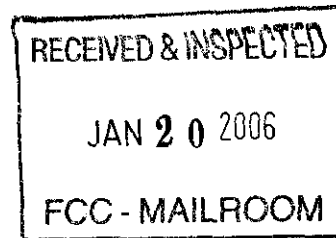


January 15, 2006



Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby - TW - A325  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Counterproposal for Millerton, OK  
(MB Docket No. 05-328)

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my Counterproposal in response to MB Docket No. 05-328, Millerton, Oklahoma.

Respectfully submitted,

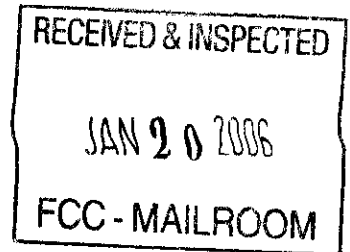
A handwritten signature in black ink, appearing to be "Charles Crawford", written over a horizontal line.

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205  
(214) 520-7077      Tele  
(214) 443-9308      Fax

Mill Cov

No. of Copies rec'd 024  
List ABOVE

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**



In the Matter of	)	
	)	
Amendment of 73.202 (b)	)	MB Docket No.05-328
Table of Allotments	)	RM-10577
FM Broadcast Stations	)	
(Millerton, OK	)	

To: Office of the Secretary  
Attn: Audio Division, Media Bureau

**COUNTERPROPOSAL**

I, Charles Crawford, hereby submit this counterproposal requesting that the Commission amend Section 73.202(b) of its Rules, FM Table of Allotments, to allot FM Channel 265C2 to Millerton, Oklahoma in lieu of Channel 265A to Millerton, Oklahoma as proposed in the Notice of Proposed Rule Making in the above-captioned proceeding.

As demonstrated in the attached channel study, this proposal conflicts with the NPRM proposal to allot Channel 265A to Millerton, Oklahoma. The counterproposal also provides for the a 1<sup>st</sup> local service to the community of Millerton, Oklahoma, as does the NPRM.

Attached hereto is a channel study confirming that Channel 265C2 can be allocated to Millerton, Oklahoma, consistent with the FCC's FM separation rules. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment A)

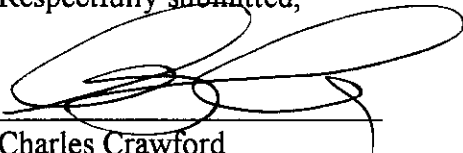
*Reference coordinates for Channel 265C2 at Millerton, Oklahoma are:*

34 07 00 N  
94 55 30 W

Should this counterproposal be granted and Channel 265C2 is allotted to Millerton, Oklahoma, Counterproponent will apply for Channel 265C2 at Millerton and after it is authorized, will promptly construct the new facility.

The factual information provided in this Counterproposal is correct and true to the best of my knowledge.

Respectfully submitted,



Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205  
(214) 520-7077      Tele  
(214) 443-9308      Fax

cc: Gene A. Bechtel, Law Office of Gene Bechtel, Suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for Charles Crawford. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as Charles Crawford.

January 15, 2006

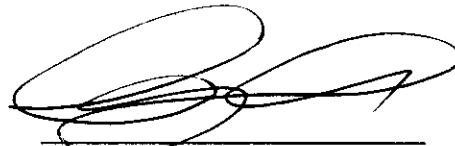
## CERTIFICATE OF SERVICE

*I, Charles Crawford, hereby certify that on this 15<sup>th</sup> day of January, 2006, I*  
caused copies of the foregoing "Counterproposal" to be placed in the U.S. Postal Service,  
first class postage prepaid, addressed to the following persons:

Mr. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby-TW-A325  
Washington, D.C. 20554

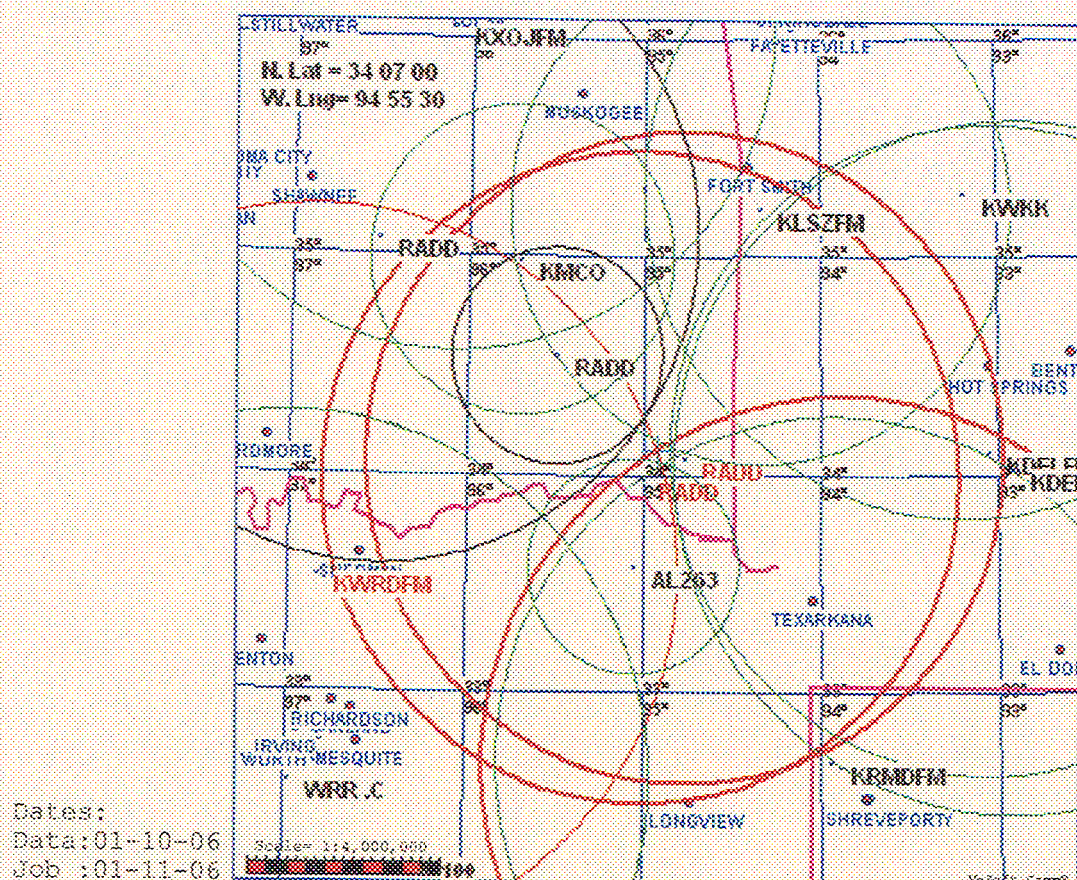
Gene Bechtel, Esq.  
Law Offices of Gene Bechtel, P.C.  
1050 17<sup>th</sup> Street, N.W., Suite 600  
Washington, D.C. 20036-5517  
(Counsel for Petitioner)

Jeraldine Anderson  
1702 Cypress Drive  
Irving, Texas 75061

  
Charles Crawford

**ATTACHMENT A**

(Channel study for Channel 265C2 at Millerton, Oklahoma)



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	265A	ADD	Broken Bow	OK	15.39	106.2	166.0	-150.61
RADD	265A	ADD	Millerton	OK	16.64	209.2	166.0	-149.36
RADD	266C	ADD	Oil City	LA	187.75	148.6	188.0	-0.25
KWRDFM	264C	LIC N	Highland Village	TX	187.90	250.4	188.0	-0.10
KLSZFM	264C2	LIC	Fort Smith	AR	134.13	23.2	130.0	4.13
AL263	263A	VAC	Annona	TX	60.58	191.5	55.0	5.58
KDELFC	265A	LIC	Arkadelphia	AR	172.97	89.7	166.0	6.97
KMRDFM	266C0	CP	Oil City	LA	183.58	149.7	176.0	7.58
KMRDFM	266C0	LIC	Shreveport	LA	183.58	149.7	176.0	7.58
KDELFC	265C3	CP	Arkadelphia	AR	186.02	92.3	177.0	9.02
RADD	265A	ADD	Holdenville	OK	181.02	306.8	166.0	15.02
RADD	263A	ADD	Clatyon	OK	70.97	312.5	55.0	15.97
KWK	265A	LIC N	Russellville	AR	206.58	50.2	166.0	40.58
RADD	267C1	ADD	Wilburton	OK	120.06	323.9	79.0	41.06
RDEL	267C1	DEL	Mcalester	OK	120.06	323.9	79.0	41.06
KMCO	267C1	LIC	Mcalester	OK	120.06	323.9	79.0	41.06
WRR .C	266C	CP	Dallas	TX	254.72	228.7	188.0	66.72
WRR	266C	LIC	Dallas	TX	254.76	228.8	188.0	66.76
KXOJFM	265A	LIC	Sapulpa	OK	240.83	334.0	166.0	74.83



# Millerton, OK CH 265C2 70 dBu

Mag 10.00  
Wed Jan 11 14:54 2006  
Scale 1:500,000 (at center)

- Local Road
- Major Connector
- State Route
- US Highway
- County Seat
- Small Town
- Park/Reservation
- Locale
- State Boundary
- Population Center
- Land
- Water
- National Park
- State Park/Forest
- River/Canal
- Inundated Area
- Zipcode Boundary

